

EXHIBIT 4

PROPOSED ORDER

**UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF NEW YORK**

SECURITIES INVESTOR PROTECTION
CORPORATION,

Plaintiff-Applicant,

v.

BERNARD L. MADOFF INVESTMENT SECURITIES
LLC,

Defendant.

Adv. Pro. No. 08-01789 (SMB)

SIPA LIQUIDATION

(Substantively Consolidated)

In re:

BERNARD L. MADOFF,

Debtor.

IRVING H. PICARD, Trustee for the Liquidation of Bernard
L. Madoff Investment Securities LLC,

Plaintiff,

v.

Edward A. Zraick, Jr., individually and as joint tenant;
Nancy Zraick, individually and as joint tenant; Patricia
Zraick DeLuca, individually and as joint tenant; Karen M.
Rich, individually and as joint tenant; Estate of Lorraine
Zraick; Edward A. Zraick, Jr., as personal representative of
the Estate of Lorraine Zraick; and Patricia Zraick DeLuca, as
personal representative of the Estate of Lorraine Zraick,

Defendants.

Adv. Pro. No. 10-05257 (SMB)

**ORDER (A) CLARIFYING THAT DEFENDANTS
MAY COMMUNICATE WITH THEIR FINANCIAL INSTITUTIONS,
AND (B) DESIGNATING ANY BANK RECORDS PRODUCED IN
RESPONSE TO THE TRUSTEE'S SUBPOENAS AS CONFIDENTIAL**

Upon consideration of the motion (the "Motion")¹ of Defendants Edward A. Zraick, Jr., Nancy Zraick, Patricia DeLuca, and Karen Rich (collectively, the "Defendants") for the entry of an order (a) clarifying that Defendants may communicate with their current or former financial

¹ Capitalized terms not defined herein shall have the meanings ascribed to such terms in the Motion.

institutions (collectively, the “Banks”) regarding Fed. R. Civ. P. 45 subpoenas (the “Subpoenas”) served upon them by Plaintiff Irving H. Picard, as Trustee for the Liquidation of Bernard L. Madoff Investment Securities LLC (the “Trustee”); and the Court finding that adequate notice of the relief requested in the Motion has been provided and no further or other notice is necessary; and that good and sufficient cause exists for the granting of the relief requested in the Motion after having given due deliberation upon the Motion;

IT IS HEREBY ORDERED THAT:

1. The Motion is **GRANTED**.
2. Notwithstanding any prior ruling or order of this Court, and unless otherwise ordered, Defendants may communicate with the Banks in connection with the Subpoenas, including without limitation by objecting to the Banks’ disclosure of the Personal Financial Information to the extent such disclosure violates the GLBA.
3. Any and all documents produced in response to the Subpoenas shall be treated as confidential as provided by the June 6, 2011 Litigation Protective Order.
4. The Trustee shall provide Defendants with copies of any and all documents received in response to the Subpoenas within three (3) business days of receipt thereof.
5. The Court shall retain jurisdiction over all matters relating to the enforcement, implementation, and interpretation of this Order.

Dated: New York, New York
April __, 2016

THE HONORABLE STUART M. BERNSTEIN
UNITED STATES BANKRUPTCY JUDGE